

**UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:)	Chapter 11
)	
W.R. GRACE & CO.,)	Case No. 01-01139 (JJF)
)	(Jointly Administered)
Debtor.)	Objections due by: 10/29/01 @ 4 p.m.
)	Hearing Date: 11/5/01 @ 2 p.m.

NOTICE OF MOTION

TO: SEE ATTACHED SERVICE LIST

Caterpillar Financial Services Corporation (“Caterpillar”) has filed its **Motion of Caterpillar Financial Services Corporation to Compel Debtors to Comply with 11 U.S.C. § 365(d)(10) and for Allowance and Payment of Administrative Expenses, Or, in the Alternative, for Adequate Protection.**

You are required to file a response to the attached motion on or before **October 29, 2001 at 4 p.m.** with the United States Bankruptcy Court for the District of Delaware.

At the same time, you must also serve a copy of the response upon Movant’s attorney:

Brett D. Fallon, Esquire
Christina M. Maycen, Esquire
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HEARING ON THE MOTION WILL BE HELD ON **November 5, 2001 at 2:00 p.m.** before the Honorable Joseph J. Farnan, Jr. in the United States District Court for the District of Delaware, 844 N. King Street, Wilmington, Delaware 19801.

IF YOU FAIL TO RESPOND IN ACCORDANCE WITH THIS NOTICE, THE COURT MAY GRANT THE RELIEF DEMANDED BY THE MOTION WITHOUT FURTHER NOTICE OR HEARING.

By: /s/ Christina M. Maycen

Brett D. Fallon (I.D. No. 2480)

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Attorneys for Caterpillar Financial Services
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Dated: October 18, 2001